

**FISHER & PHILLIPS LLP**  
 300 S Fourth Street, Suite 1500  
 Las Vegas, Nevada 89101

FISHER & PHILLIPS LLP  
 LISA A. MCCLANE, ESQ.  
 Nevada Bar No. 10139  
 300 S. Fourth Street, Suite 1500  
 Las Vegas, Nevada 89101  
 Telephone: (702) 252-3131  
[lmcclane@fisherphillips.com](mailto:lmcclane@fisherphillips.com)  
*Attorneys for Defendant*

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

TARLOK SINGH KHAKH,	)	Case No.: 2:22-cv-00519-CDS-EJY
	)	
Plaintiff,	)	<b>STIPULATION AND ORDER TO</b>
	)	<b>EXTEND DISCOVERY</b>
vs.	)	<b>DEADLINES</b>
	)	
BHAJAN SIDHU dba SMOKE 4 U,	)	<b>(FIRST REQUEST)</b>
	)	
Defendant.	)	
	)	

IT IS HEREBY STIPULATED AND AGREED, by and between the parties' counsel of record, that discovery deadlines in the Discovery Plan and Scheduling Order (ECF No. 10) be extended ninety days (90) days to allow the parties to serve written discovery, for Defendant to take the Plaintiff's deposition, and for Plaintiff to take the deposition of Defendant's 30(b)(6) witness(es). The parties are exploring possible resolution of the claims prior to providing notices for depositions, and respectfully request additional time to complete discovery in this case. Accordingly, the parties are also requesting the following deadlines also be modified:

///

///

///

///

///

Description of Discovery Deadline	Current Discovery Deadline	<del>Proposed</del> Discovery Deadline
Discovery Cut Off	December 26, 2022	March 27, 2023 (as the 90 <sup>th</sup> day is Sunday, March 26, 2023)
Dispositive Motion(s)	January 25, 2023	April 26, 2023
Joint Pretrial Order <sup>1</sup>	February 24, 2023	May 26, 2023

The parties provide the following information to the Court regarding the proposed extension of the discovery deadline. The reason for the parties' inability to comply with this deadline is to explore possible resolution of the claims, and if resolution is not reached, to coordinate multiple schedules and engage multiple translators to conduct the necessary depositions for this case.

**Discovery Completed To Date**

The parties have exchanged their initial disclosures. Defendant has served requests for production and request for interrogatories on Plaintiff, for which responses are not yet due.

**Remaining Discovery To Be Completed**

Plaintiff intends to serve an initial set of written discovery; Defendant intends to conduct the deposition(s) of Plaintiff; Plaintiff intends to conduct the depositions of Rule 30(b)(6) designees; depositions may also be conducted of any current or former employees; and the parties may also conduct additional related written discovery.

**Reasons Discovery Could Not Be Completed Within The Existing Deadline**

The parties have been exploring possible resolution and recently settled a related matter. They continue to make progress in this matter but have agreed if resolution is not reached, to coordinate multiple schedules for and conduct necessary depositions in order to fully evaluate the claims and defenses presented. This

---

<sup>1</sup> If dispositive motions are filed, the Joint Pretrial Order will be due thirty (30) days after the Court enters its decision on any dispositive motion(s).

1 extension will allow the parties to conduct depositions prior to the close of the  
2 proposed discovery period.

3 This is the parties' first request for an extension of the discovery deadline date  
4 and is not made to delay this matter. Based upon the foregoing, the parties believe  
5 there is good cause for the requested extension.

6 Dated this 5th day of December, 2022.

8 FISHER & PHILLIPS LLP

LAW OFFICES OF MICHAEL P.  
BALABAN

10 /s/ Lisa A. McClane, Esq.  
LISA A. MCCLANE, ESQ.  
11 MARIAN L. MASSEY, ESQ.  
300 South Fourth Street, Suite 1500  
12 Las Vegas, Nevada 89101  
*Attorneys for Defendant*  
13 *Bhajan Sidhu dba SMOKE 4 U*

/s/ Michael P. Balaban, Esq.  
Michael P. Balaban, Esq.  
10725 Del Rudini Street  
Las Vegas, Nevada 89141  
*Attorney for Plaintiff*

14 **ORDER**

16 IT IS SO ORDERED:

17   
UNITED STATES MAGISTRATE JUDGE

18 December 5, 2022

19 DATED

FISHER & PHILLIPS LLP

300 S Fourth Street, Suite 1500  
Las Vegas, Nevada 89101